

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T6-28 AND 31 (A) AND (B))**

The United States Postal Service hereby provides its responses to the above-listed, follow-up interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated April 6, 2012. Each interrogatory is stated verbatim and is followed by the response. A status report concerning interrogatory APWU/USPS-T6-29 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

APWU/USPS-T6-28. State separately the number of PVS routes and the number of HCR routes in each of the following categories:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

RESPONSE:

As of April 2012, the number of HCR routes in the transportation categories identified in the interrogatory are provided in the table below:

Category	No. of Routes
Inter-Area Routes	797
Inter-Cluster	427
Inter P&DC	329
Intra P&DC	5,609

Because the routes that are serviced by PVS typically operate between a plant and delivery points such as Post Office stations and branches, mailers, and other firms, PVS routes primarily fall within the Intra P&DC transportation category. The estimated number of PVS routes identified in the Postal Service Enterprise Data Warehouse as of June 10, 2012, is 9,297.

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TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

APWU/USPS-T6-31. You testified (p. 5, line 9) that: “Generally, a truck run that is routinely less than sixty (60) percent full is directed to a consolidation facility so that the Postal Service can take full advantage of the truck’s carrying capacity.”

- a. Is the 60% full designation of truck utilization by Mail Transfer Equipment (MTE) or by actual mail volume?
- b. Does the 60% full designation include empty MTE – that is if a full truck is carrying 50% of MTE that are fully laden and 20% of MTE that are empty, does this load run direct or through consolidation point?
- c. Has the USPS every engaged in estimating the cube utilization of routes by actual mail cube (not MTE) as a percentage of vehicle cube? If yes, provide examples.
- d. What is the basis for using 60 percent for such decisions – how is the type and size of truck factored into such decision process, and how is the costing adjusted if a smaller truck can be used that provides for 80 percent or 100 percent utilization and reduces operating cost?

RESPONSE:

- (a) Actual mail volume.
- (b) The 60 percent figure that I used in my testimony does not include empty MTE.
- (c) [USPS objection filed on April 16, 2012. Motion to compel denied on May 10, 2012.]
- (d) [USPS objection filed on April 16, 2012. Motion to compel denied on May 10, 2012.]